

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**IN RE:
RICHMOND CHRISTIAN CENTER,

Debtor.**

**Bankruptcy Case
No.: 13-36312-KLP
Chapter 11**

OBJECTION TO ENTRY OF ORDER TO EMPLOY REAL ESTATE BROKERS, INC.

Foundation Capital Resources, Inc. ("**Foundation Capital**"), by counsel, appears before the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division ("**Bankruptcy Court**"), in response to the Debtor-in-Possession's Application for Authority to Employ Real Estate Brokers, Inc. ("**Application**"). The Application was filed by Richmond Christian Center ("**Debtor**") as ECF Docket No. 45. For the reasons stated in this Objection, Foundation Capital objects to the Application and requests that the Bankruptcy Court schedule a hearing on the Application.

1. On April 18, 2014, the Debtor filed the Application. In paragraph 7 of the Application the Debtor states that Real Estate Brokers, Inc. ("**Broker**") is "disinterested as that terms (sic) is defined in § 104(14)."

2. At a status hearing on June 18, 2014, counsel for the Debtor disclosed to the Bankruptcy Court that Charles Cochrane, the primary responsible party at the Broker, had received unauthorized payments from the Debtor during the pendency of the case. The reason for the unauthorized payments to Charles Cochrane has not been disclosed.

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Counsel for Foundation Capital Resources, Inc.

3. Despite demand for repayment, the Debtor's counsel stated that Charles Cochrane has not repaid in full the unauthorized payments. The Debtor's counsel only stated that the amounts would be repaid in the future.

4. Charles Cochrane and/or the Broker are indebted to the Debtor. This constitutes an interest materially adverse to the Debtor's estate. Thus, the Broker is not disinterested and the Application should not be approved until the Bankruptcy Court conducts a hearing on the Application.

5. For the reasons stated above, the Application should be denied until the Bankruptcy Court schedules a hearing on the Application and determines whether the Broker is disinterested.

FOUNDATION CAPITAL RESOURCES, INC.

By: 
/s/ Paul K. Campsen
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of June, 2014, a true copy of the foregoing pleading is being filed with the Bankruptcy Court's Electronic Case Filing System, which will send a Notice of Electronic Filing to all creditors and parties-in-interest who are included in the Bankruptcy Court's ECF e-mail notification system, and is also being sent *via* U.S. Mail, postage prepaid, to the following:

Kevin J. Funk, Esq.
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Robert B. Van Arsdale, Assistant
United States Trustee
Office of the United States Trustee
701 East Broad Street, Suite 4304
Richmond, VA 23219

To Those Parties Listed on **Schedule 1.**



/s/ Paul K. Campsen

Schedule 1

BB&T Bankruptcy Section
Mailcode: 100-50-01-51
P.O. Box 1847
Wilson, NC 27894-1847

City of Richmond VA Real Estate
P.O. Box 105304
Atlanta, GA 30348-5304

City of Richmond – City Hall
Room 109 Delinquent Taxes
900 East Broad Street
Richmond VA 23219-1907

Comtel Security Services
8016 Staples Mill Road
Henrico, VA 23228-2713

City of Richmond – Stormwater
Department of Public Utilities
P.O. Box 75650
Baltimore, MD 21275-5650

First Equity Card Corp.
P.O. Box 23029
Columbus, GA 31902-3029

Dutton Equipment Repair, Inc.
163 Brandon Road
Richmond, VA 23224-1211

Internal Revenue Service
Centralized Insolvency Operations
P.O. Box 7346
Philadelphia, PA 19101-7346

M&T Bank
Legal Document Processing
1100 Wherle Drive
Williamsville, NY 14221-7748

SunTrust Bank
P.O. Box 305053
Nashville, TN 37230-5053

SunTrust Bank
Attn: Support Services
P.O. Box 85092
Richmond, VA 23286-0001

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P.O. BOX 1847
WILSON, NC 27894-1847

Allied Waste Service
P.O. Box 9001009
Louisville, KY 40290-1009

City of Richmond
Dept. of Public Utilities
P.O. Box 26060
Richmond, VA 23274-0001

Citibusiness
P.O. Box 6077
Sioux Falls, SD 57117-6077

City of Richmond
Dept. of Public Utilities
730 E. Broad St., 5th Floor
Richmond, VA 23219-1861

Department of Motor Vehicles
Adjudication Services
P.O. Box 37075
Washington, DC 20013-7075

Sawkal Communications, Inc.
843 Meadowbridge Road
Mechanicsville, VA 23116-0000

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P.O. Box 1508
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Utility Management Services, Inc.
P.O. Box 890134
Charlotte, NC 28289-0134

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Internal Revenue Service
Kansas City, MO 64999-0202

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Dallas, TX 75266-0720

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